

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

MARGARET CONE,

Plaintiff,

Case No. 2:16-cv-11306-SFC-SDD

v.

Hon. Sean F. Cox
Mag. Judge Stephanie D. Davis

**MARK TESSLER, SHERMAN
JACKSON and DAVID HOWELL,
joint and severally**

Defendants.

Margaret Cone
Plaintiff, Pro Se
Belmont Rd., N.W. # 511
Washington, D.C. 20009
Telephone: (202) 265-3988
MargaretCone@aol.com

Thomas B. Bourque (P46595)
EBY CONNER SMILLIE & BOURQUE, PLLC
Attorneys for Defendants
301 North Main Street, Second Floor
Ann Arbor, MI 48104
Telephone: (734) 769-2691
tbourque56@gmail.com

Megan P. Norris (P39318)
Kimberly L. Scott (P69706)
M. Misbah Shahid (P73450)
MILLER, CANFIELD, PADDOCK
AND STONE, P.L.C.
Attorneys for Non-Party University of Michigan
150 West Jefferson, Suite 2500
Detroit, Michigan 48226
(313) 963-6420 / fax 313 496-7500
norris@millercanfield.com
shahid@millercanfield.com

**DEFENDANTS' APPENDIX TO STATEMENT OF FACTS
NOT IN MATERIAL DISPUTE AND INDEX OF EXHIBITS**

1. Margaret Cone October 10, 2017 deposition excerpts.
2. Sherman Jackson October 9, 2017 deposition excerpts.

- 3. David Howell February 6, 2018 deposition excerpts.
- 4. Mark Tessler February 7, 2018 deposition excerpts.
- 5. Nancy Burns February 2, 2018 deposition excerpts.
- 6. Terrence McDonald November 30, 2017 deposition excerpts.
- 7. WLPI v Tessler et al. Case No. 2:14-cv-13852-SJM-MKH- selected pages of Plaintiff's complaint. Pages 1-5.
- 8. WLPI v Tessler et al. Washtenaw Circuit Court Case No. 15-655-CK- selected pages of Plaintiff's complaint. Pages 1, 4.
- 9. Michigan Court of Appeals opinion *World Leadership Program Institute v Mark Tessler et. al.* February 9, 2017. *Also found at* (D.E. No. 54-5).
- 10. Margaret Cone Affidavit November 25, 2015. *Also found at* (D.E. No. 54-4).
- 11. Otaiba letter to Tessler (undated) (D.E. No. 1-4).
- 12. Tessler October 30, 2009 letter to Otaiba (Cone Deposition Exhibit 8).
- 13. Tessler/Jackson December 1, 2009 letter to Otaiba (D.E. No. 1-5).
- 14. Tessler/Jackson December 14, 2009 letter to Al Azhar (D.E. No. 1-6).
- 15. Tessler/Jackson January 15, 2010 letter to Otaiba (D.E. No. 1-7).
- 16. Cone Answers to Interrogatories dated August 24, 2017. (Defendants' deposition Exhibit 25).

17. AL Shamsi letter to Tessler dated February 16, 2010 and Telegraphic Transfer Advice dated February 10, 2010 (Defendants' deposition Exhibit 53).
18. Emails from Margaret Cone to Sherman Jackson dated March 16, 2010 and April 8, 2010 (Defendants' deposition Exhibit 56).
19. Email from Margaret Cone to Sherman Jackson and Mark Tessler dated March 16, 2010 (Defendants' deposition Exhibit 68).
20. Email string from Mark Tessler to Nancy Burns and David Howell dated November 3, 2009 (Cone deposition Exhibit 14).
21. Institute for Social Research Sundry Account Request Form and journal entry dated June 16, 2010 (Cone deposition Exhibit 95).
22. World Leadership Program University of Michigan Direct Cost Ledger (Cone deposition Exhibit 109).
23. December 8, 2010 Invoice from Margaret Cone to Yousef Al Otaiba (Defendants' deposition Exhibit 91). *Cone Bates # 357.*
24. *Taunt v Oakwood United Hospital*, 2008 U.S. Dist. LEXIS 36000 (E.D. Mich.)
25. *Cotter v Derrick*, 2007 Mich. App. LEXIS 1456
26. WLPI v Tessler et al. Case No. 2:14-cv-13852-SJM-MKH- selected pages of Defendants' Brief in Support of Motion to Dismiss dated October 30, 2014.

Pages 1, 8-15, 19.

27. World Leadership Program Budget (D.E. No. 1-3).
28. Memorandum from Margaret Cone to The Honorable Yousef Al Otaiba dated January 15, 2010 Re; Timeline for Implementing the World Leadership Program. (*Cone Bates #671-672*).
29. WLPI v Tessler et al. Case No. 2:14-cv-13852-SJM-MKH- Opinion and Order Granting Defendants' Motion to Dismiss dated April 28, 2015.
30. Tessler/Jackson letter to Otaiba dated April 28, 2010 (*Cone Bates #460-461*).
31. *Mercy Services for the Aging v City of Rochester Hills*, 2010 WL4137465 (2010).